

Exhibit 4

Defendants' Motion to Strike

03 MDL No. 1570 (RCC) / C.A. No. 03-CV-9849 (RCC)

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By Hand Delivery or Electronic Mail
July 26, 2004

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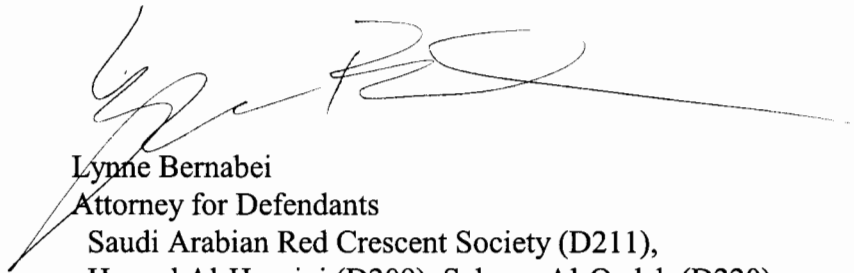
Re: *In re* Terrorist Attacks on Sept. 11, 2001, No. 03 MDL 1570 (RCC);
Burnett, et al. v. Al Baraka Inv. & Dev. Corp., et al., No. 03-CV-9840 (RCC)

Dear Counsel:

Pursuant to Rule 11(c)(1)(A), Fed. R. Civ. P., enclosed please find the draft Notice of Defendants' Motion for Rule 11 Sanctions Against Plaintiffs' Counsel, and a memorandum of law thereto, with Exhibits 1-5 attached.

Ronald L. Motley, Esquire
Paul J. Hanly, Jr., Esquire
Harry Huge, Esquire
July 26, 2004
Page 2

Sincerely,

A handwritten signature in black ink, appearing to read 'Lynne Bernabei', is written over the typed name.

Lynne Bernabei
Attorney for Defendants
Saudi Arabian Red Crescent Society (D211),
Hamad Al-Husaini (D209), Salman Al-Oadah (D220),
Safer Al-Hawali (D221), and Saleh Al-Hussayen (D222)

Enc.

cc: MDL-1570 Counsel (by e-mail)